

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:	}	
Joseph & Tanya Krantz	}	Case No. 13-06550
1264 Porter Morris Rd.	}	Chapter 13
Chapmansboro, TN 37035	}	Judge Harrison
SSN: xxx-xx-3606/5581	}	
	}	
Debtors	}	

**EXPEDITED MOTION TO UTILIZE INSURANCE PROCEEDS AND SUBSTITUTE  
COLLATERAL**

- 1) Come the Debtors, by and through counsel, pursuant to 11 U.S.C. §1329 and would request that the Court enter an order allowing the Debtors to utilize insurance proceeds in the amount of \$6,363.18 resulting from the casualty loss of their 2007 Mini Cooper in order to purchase an equivalent vehicle.
- 2) Routine notice would require the Debtors to wait at least 30 days for a hearing. The Debtors' car is totaled and they no longer have adequate transportation. It is imperative they obtain a replacement vehicle as soon as possible.
- 3) Debtors' counsel will provide the U.S. Trustee and Chapter 13 Trustee's office notice electronically and all other affected creditors as indicated on the certificate of service.
- 4) The Debtors request the expedited hearing be set on February 1, 2017 at 8:30 a.m. in Courtroom One of the United States Bankruptcy Court for the Middle District of Tennessee, 701 Broadway, Nashville, TN 37203.
- 5) In support of this motion, the Debtors would state:
  - a. Debtors' 2007 Mini Cooper has been damaged and declared a total loss.
  - b. Insurance proceeds are set to issue in the amount of \$6,363.18.

- c. Inland Bank is a secured creditor in this case and has a perfected security interest in the 2007 Mini Cooper.
- d. The Debtors would request they be permitted to use the insurance proceeds to purchase a substitute vehicle. Inland Bank shall have 30 days to record a lien on the title of the new vehicle.

Respectfully submitted,

/s/ Gregory R. Atwood  
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**CERTIFICATE OF SERVICE**

I hereby certify that on January 26, 2017 I furnished a true and correct copy of the foregoing to the following parties in interest:

Henry E. Hildebrand, III Chapter 13 Trustee P.O. Box 340019 Nashville, TN 37203	Electronic
U.S. Trustee 318 Customs House, 701 Broadway Nashville, TN 37203	Electronic
Joseph & Tanya Krantz 1264 Porter Morris Rd. Chapmansboro, TN 37035	U.S. mail first class
Inland Bank Attn: Susan Faulkner 2faulkners@att.net	Via email

4 notices have been served.

/s/ Gregory Atwood  
Gregory Atwood